

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

Blockquarry Corp. f/k/a ISW Holdings, Inc.,

Plaintiff,

v.

Litchain Corp. and Gaffney Board of Public
Works,

Defendants.

C/A No.: 7:23-cv-01427-TMC

Gaffney Board of Public Works,

Counter-/Cross-Claimant,

v.

Blockquarry Corp. f/k/a ISW Holdings, Inc.,
Counterclaim Defendant, and Litchain Corp.,

Crossclaim-Defendant.

DECLARATION OF *LAWRENCE DAVIS*

Pursuant to 28 U.S.C. § 1746, Lawrence Davis declares as follows:

1. I am over the age of eighteen years and competent to testify in the instant case.
2. I am employed by Pantheon Resources, Inc. ("Pantheon"), and I serve as the 'chief operating officer' of Plaintiff Blockquarry Corp. f/k/a ISW Holdings, Inc. ("Blockquarry"). I am an Army veteran with an honorable discharge.
3. Pantheon was retained by Blockquarry to, among other things, remove and inventory Bitcoin mining equipment from real property located at 150 Hyatt Place, Gaffney, South Carolina (the "Premises") and transport it to Plaski County, Missouri, near the city of Crocker (the "Crocker Site"). The equipment included, among other things, (20) forty-foot

shipping containers, numbered one through twenty ("container" or, collectively, containers"), with Bitcoin mining servers installed within them. The Premises is the same real property at issue in this litigation and is owned by Defendant Gaffney Board of Public Works (the "Utility").

4. I presented on the Premises on dates in October with authorization from the Utility but was not permitted inside the fence line bounding the Premises until October 19, 2023. Except for weekends, I was on the Premises every day from November 7 to November 16, 2023 with authorization from the Utility.

5. During my time on the Premises during November, I frequently spoke in-person with representatives and employees of the Utility, including Brad Wright and Joe Blanton. I understand Mr. Wright is the Utility's 'electrical superintendent' and Joe Blanton is 'electrical meter technician.'

6. On more than one occasion, Messrs. Wright and Blanton informed me that the Utility allowed various contractors on to the Premises, including Blockquarry's management contractor, and that these people removed personal property from the Premises, including a vehicle, copper wiring, spooled wire, and other equipment.

7. On behalf of Blockquarry, I caused Pantheon and its contractor to conduct an inventory of the Bitcoin mining equipment present on the Premises and that Pantheon removed from the Premises, after the equipment was transported to the Crocker Site (sometimes, the "Blockquarry Inventory"). The results of the Blockquarry Inventory were shared with me, and I reviewed them. The inventory shows Blockquarry's personal property on the Premises, including the containers and Bitcoin mining servers installed within them, were tampered with, trespassed upon, and potentially removed—all without authorization from Blockquarry.

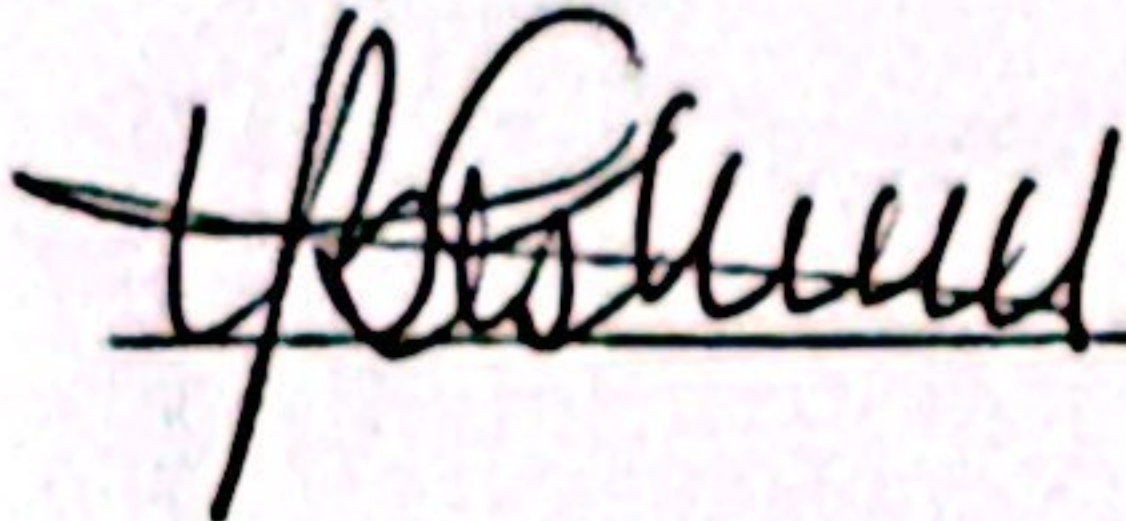
[signature page follows]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NOT.

AFFIRMATION

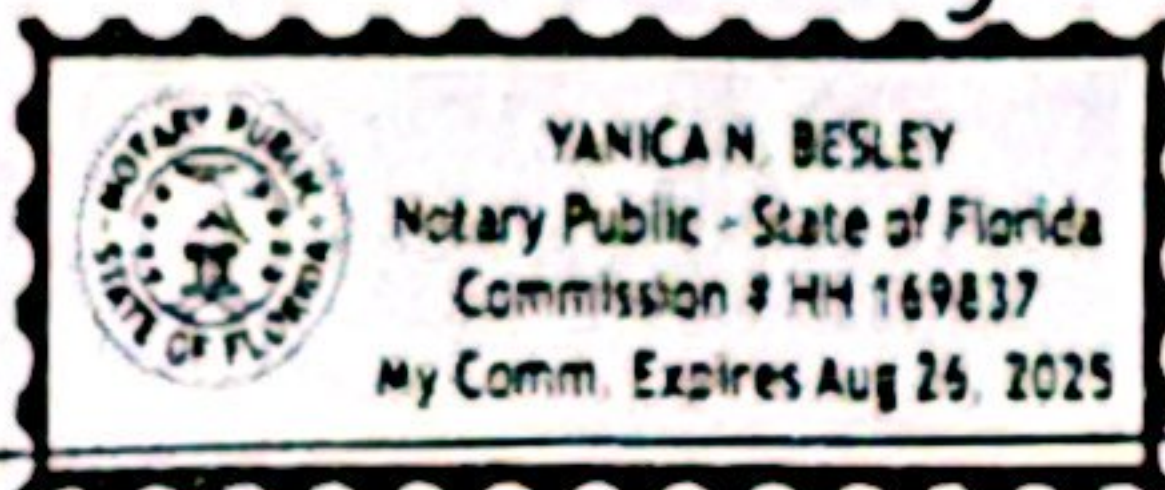
Sworn before me on the 12 day of January 2024.



Notary Public for State of Florida

My Commission expires: Aug 26, 2025

[seal]



LAWRENCE DAVIS



Lawrence Davis, in his capacity as employee of Pantheon Resources, Inc.

Executed on January 12, 2024.